



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

January 14, 2005

Certified Mail No. 7000 0520 00850 3960

Jeff Abbott
Bennett Lumber Products, Inc.
P.O. Box 49
Princeton, ID 83857-0049

RE: Facility ID No. 057-00008, Bennett Lumber Products, Inc., Princeton
Final Tier I Operating Permit Letter

Dear Mr. Abbott:

The Idaho Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. TI-020203 for Bennett Lumber Products, Inc. (Bennett Lumber) in accordance with IDAPA 58.01.01.300 through 386, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units.

The enclosed operating permit is based on the information contained in your permit application, received June 10, 2002. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules*.

DEQ notified Bennett Lumber that a Tier I operating permit renewal application deadline was approaching in a letter dated August 31, 2004. The Tier I operating permit renewal application was due on November 15, 2004. DEQ has not received a Tier I operating permit renewal as of the date of this letter. Please note that Tier I operating permit expiration terminates your right to operate unless a timely and complete application has been submitted in accordance with IDAPA 58.01.01.369.02.

A representative of the Lewiston Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Martin Bauer, Administrator
Air Quality Division

MB/DH/sd

Permit No. TI-020203

Enclosure

G:\Air Quality\Stationary Source\SS Ltd\TI\Bennett Lumber\Final\TI-020203 Final Ltr.doc

c: Hudson Mann, Lewiston, Regional Office
Dustin Holloway, Permit Writer
Dan Pitman, Permit Coordinator
Marilyn Seymore/Pat Rayne, Air Quality Division
Laurie Kral, EPA Region 10
Joan Lechtenberg, Public Comment
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)



Air Quality
TIER I OPERATING PERMIT
State of Idaho
Department of Environmental Quality

PERMIT NO.: T1-020203
FACILITY ID NO.: 057-00008
AQCR: 62 **CLASS:** A
SIC: 2421 **ZONE:** 11
UTM COORDINATE (km): 517.4, 5195.7

1. PERMITTEE

Bennett Lumber Products, Inc.

2. PROJECT

Tier I Operating Permit

3. MAILING ADDRESS

P.O. Box 49

CITY

Princeton

STATE

ID

ZIP

83857

4. FACILITY CONTACT

Jeff Abbott

TITLE

Plant Engineer

TELEPHONE

(208) 875-1121

5. RESPONSIBLE OFFICIAL

Frank R. Bennett

TITLE

President

TELEPHONE

(208) 875-1121

6. EXACT PLANT LOCATION

Three miles east of Princeton on Highway 6

COUNTY

Latah

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dimensional lumber, wood chips, hog-fuel, and wood shavings

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page. "Please be aware this permit replaces Tier I Operating Permit No. 057-00008, dated May 15, 2001, the terms and conditions of which shall no longer be in effect."

~~NOT FOR REPRODUCTION~~

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

January 14, 2005

Date Expires:

May 15, 2005

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MMbf	million board feet
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	Operation and Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.
Location: Princeton

Facility ID No.
057-00008

Date Issued: January 14, 2005
Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. TIER I OPERATING PERMIT SCOPE**Purpose**

- 1.1 This Tier I operating permit significantly modifies the original Tier I permit issued May 15, 2001. This permit incorporates the requirements of Tier II Operating Permit and Permit to Construct No. T2-010208 issued December 29, 2004.

Regulated Sources

- 1.2 Table 1.1 below lists all sources of emissions regulated in this Tier I operating permit:

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Conditions	Source Description	Emissions Control(s)
2	ST1: Truck	None
2	ST2: Truck sawdust bin	None
2	ST3: Truck chip bin	None
2	ST4: Boiler fuel storage	None
2	ST5: Auxiliary fuel bin	None
2	ST6: Shavings truck bin	None
2	ST7: Log yard waste No.1	None
2	ST8: Rock storage	None
2	ST9: Log yard waste No. 2	None
2	ST10: Ash storage	None
2	TR1: Hog in-feed conveyor	None
2	TR2: Bark conveyor system	None
2	TR3: Hog out-feed conveyor	None
2	TR4: Bark screen oversize	None
2	TR5: Deck trash conveyor	None
2	TR6: Truck bark bin conveyor	None
2	TR7: Boiler bark conveyor	None
2	TR8: Sawdust conveyor - vibrator	None
2	TR9: Chip oversize conveyor	None
2	TR10: Main fuel conveyor	None
2	TR11: Auxiliary fuel-bin conveyor	None
2	TR12: Flyash transport	None
2	P1: Sawmill	None
2	P2: Small log debarker	None
2	P3: Large log debarker	None
2	P4: Bark hog	None
2	P5: Bark screen	None
2	P6: Baghouse cyclone	None
2	P8: Chip screen	None
2	P9: Planing mill - new	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203**Permittee:** Bennett Lumber Products, Inc.
Location: Princeton**Facility ID No.**
057-00008**Date Issued:** January 14, 2005
Date Expires: May 15, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

Permit Conditions	Source Description	Emissions Control(s)
2	P10: Planing mill – old	None
2	S1: 20,000-gallon diesel fuel tank	None
2	S2: 20,000-gallon diesel fuel tank	None
2	S3: 20,000-gallon gasoline tank	None
2	S4: 2,500-gallon diesel fuel tank	None
2	S5: 1,000-gallon stove oil tank	None
2	S6: 30-gallon parts washer	None
2	S7: 30-gallon parts washer	None
2	S8: 30-gallon parts washer	None
2	S9: 2,000-gallon aviation gas storage	None
2	St10: 1,000-gallon used oil tank	None
2	St8: 2,000-cubic yard rock storage	None
2	TR13: Bark bin to truck	None
2	TR14: Sawdust bin to truck	None
2	TR15: Chip bin to truck	None
2	TR16: Shavings bin to truck	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

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Location: Princeton

Facility ID No.
 057-00008

Date Issued: January 14, 2005
Date Expires: May 15, 2005

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Permit Conditions	Source Description	Emissions Control(s)
3	Zurn Industries hog-fuel boiler: Type C, rated at 60,000 pound per hour saturated steam; installed 1978	Zurn Industries multiclone followed by Perry Smith venturi scrubber, 11,400 actual cubic feet per minute (acfm).
4	Dry kilns No. 1 and No. 2: Moore 73' double track; installed June 1972 and June 1964 Dry Kiln No. 3: Lumber systems Inc., 73' single track, installed March 1984 Dry Kilns No. 4, No. 5, and No. 6: Lumber systems Inc., 73' double track; installed June 1977, June 1977, and January 1989, respectively	None
5	Woodworking Equipment	Sawdust Cyclone P7: Aloha Metal Fab., 2,000 ft per acfm, installed January 1978 Shavings Cyclone P11: 34,600 acfm; installed 1961 Shavings Cyclone P12: 43,000 acfm; installed March 1975 Shavings Cyclone P13: 43,000 acfm, installed October 1974 Shavings Cyclone P14: Aloha Metal Fab:43,000 acfm, installed January 1978 Sawdust Cyclone P21: 2000 acfm, installed August 1994

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2. FACILITY-WIDE CONDITIONS

Table 2.1 contains a summary of requirements that apply generally to emissions units at this facility.

Table 2.1 SUMMARY OF FACILITY-WIDE CONDITIONS

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.651	2.2, 2.3, 2.4, 2.11
2.5	Odors	Reasonable control	IDAPA 58.01.01.776.01	2.6, 2.11
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.11
2.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.11
2.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11
2.14	Risk management	Compliance with IDAPA 58.01.01.322 and 40 CFR 68	IDAPA 58.01.01.322, 40 CFR 68	2.14, 2.11
2.15, 2.16	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.16, 2.11
2.17	Sulfur Content	0.3% for ASTM Grade 1; 0.5% for ASTM Grade 2	IDAPA 58.01.01.728	2.18

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

- 2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, .07, 5/1/94]

- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain a record of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The record shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, .07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.	Facility ID No. 057-00008	Date Issued: January 14, 2005
Location: Princeton		Date Expires: May 15, 2005

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- 2.4 Unless specified elsewhere in this permit, the permittee shall conduct a quarterly facility-wide fugitive emission inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain a record of the results of each fugitive emission inspection. The record shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 Unless specified elsewhere in this permit, the permittee shall maintain a record of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The record shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Visible Emissions

- 2.7 No person shall discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60 minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 Unless specified elsewhere in this permit, the permittee shall conduct a quarterly facility-wide visible emissions inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emission the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60 minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

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Excess Emissions

2.9 Unless specified elsewhere in this permit, the permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 130-136 shall govern in the event of conflicts between the Subsections of 2.9 and the regulations of IDAPA 130-136.

2.9.1 The person responsible for, or in charge of a facility during, an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 133.01(a) through (d), including, but not limited to:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by DEQ; and

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Sections 1.9.4 and 1.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

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- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify DEQ of any upset/breakdown/safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Sections 1.9.4 and 1.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in Section 134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of each such event. Each report shall contain the information specified in Section 135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five calendar year period. The excess emissions records shall be made available to DEQ upon request. The excess emissions records shall include the information requested by Section 136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, .02, .03, 3/20/97]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

[IDAPA 58.01.01.130-136, 4/5/00, .322.08.b, 3/23/98]

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Reports and Certifications

- 2.10 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 "F" St.
Lewiston, ID 83501

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[IDAPA 58.01.01.322.08,.11, 5/1/94]

Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the dates, places, and times of sampling or measurements; (b) the dates analyses were performed; (c) the companies or entities that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available to DEQ representatives upon request in either hard copy or electronic format.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 2.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-617, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-617, 3/21/03]

Renovation/Demolition

- 2.13 The permittee shall comply with all applicable portions of 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61 Subpart M]

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Regulated Substances for Accidental Release Prevention

2.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR Part 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130; or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
- [40 CFR 68.10 (a)]

Test Methods

2.15 If testing is required, the permittee shall use the following test methods to measure the pollutant emissions:

Pollutant	Test Method	Special Conditions
Particulate Matter of 10 microns or less (PM ₁₀)	EPA Method 201A* EPA Method 202*	
Particulate Matter (PM)	EPA Method 5*	
Carbon Monoxide (CO)	EPA Method 10*	
Volatile Organic Compounds (VOC)	EPA Method 25*	
Opacity	EPA Method 9*	If New Source Performance Standards (NSPS) source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or a DEQ-approved alternative in accordance with IDAPA 58.01.01.157

[IDAPA 58.01.01.157, 4/5/00]

Compliance Testing

2.16 If testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test. This time period may be shortened with DEQ approval, or if allowed in a permit, order, consent decree. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used,
- Any extenuating or unusual circumstances regarding the proposed test, and
- The proposed schedule for conducting and reporting the test.

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Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to DEQ a compliance test report for the test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test reports, and all other correspondence shall be sent to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 "F" St.
Lewiston, ID 83501
(208) 799-4370 Fax: (208) 779-3451

[IDAPA 58.01.01.157,4/5/00; 322.06, .08.a, .09, 5/1/94]

Sulfur Content

2.17 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

2.18 The permittee shall maintain documentation of supplier verification of ~~distillate fuel oil sulfur content~~ on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.	Facility ID No. 057-00008	Date Issued: January 14, 2005	Date Expires: May 15, 2005
Location: Princeton			

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

3. ZURN INDUSTRIES HOG-FUEL BOILER

Table 3.1 below describes the devices used in controlling emissions from the sources regulated in this permit.

Table 3.1 CONTROL DEVICES

Emissions Unit(s)/ Process(es)	Emissions Control Device
Hog-fuel boiler	Multiclone in series with a wet scrubber

Table 3.2 contains only a summary of requirements that apply to the hog-fuel boiler. Specific permit requirements are listed below.

Table 3.2 REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.1	PM grain loading	PM emissions shall not exceed 0.200 gr/dscf at 8% oxygen	IDAPA 58.01.01.677	3.12, 3.13, 3.14, 3.15
3.2	PM ₁₀ , NO _x , and CO limits	Hourly and annual emissions limits	Tier II/PTC No. 057-00008, issued December 29, 2004	3.12, 3.13

Operating Requirements

- 3.1 A person shall not discharge into the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10,000,000 BTUs per hour, particulate matter in excess of .200 gr/dscf corrected to 8% oxygen while combusting wood fuel.

[IDAPA 58.01.01.677, 5/1/94]

- 3.2 Emissions of PM₁₀, NO_x, and CO shall not exceed the corresponding limits below in Table 3.3.

Table 3.3 HOG-FUEL BOILER HOURLY AND ANNUAL EMISSIONS LIMITS

Emission Limits ^a - Hourly (lb/hr), and Annual ^b (T/yr)						
Source Description	Hourly PM ₁₀ ^c Emissions (lb/hr)	Annual PM ₁₀ ^c Emissions (T/yr)	NO _x		CO	
			lb/hr	T/yr	lb/hr	T/yr
Zurn hog-fuel boiler	13.7	58.5	11.8	50.4	32.1	137.4

^a As determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensables.

[Tier II/PTC No. T2-010208, 12/29/04]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.
Location: Princeton

Facility ID No.
057-00008

Date Issued: January 14, 2005
Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 3.3 The operational steaming rate shall be maintained at or below 120% of the average steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with Permit Condition 3.1 of this permit. If a maximum operational steaming rate of 120% of the average steaming rate attained during the most recent performance test would exceed the emission limit in Permit Condition 3.1, the maximum operational steaming rate shall be limited to the steaming rate obtained by the following equation:

$$\text{Max. steam rate} = \text{Ave. steam rate during test} \times \left(\frac{0.20 \text{ gr/dscf @ 8\% Oxygen}}{\text{tested grain loading @ 8\% Oxygen}} \right)$$

The permittee may conduct additional performance tests during the permit term to revise the allowable steaming rate so long as the performance tests conform to all requirements of this permit. Whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than 24 hours from the discovery of the exceedance, to bring the steaming rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[IDAPA 58.01.01.322.01, 3/19/99]

- 3.4 The following conditions apply to the multiclone and wet scrubber:

- The multiclone and wet scrubber shall be in operation at all times during operation of the hog fuel boiler.
- The pressure drop across the multiclone and wet scrubber shall be maintained within the pressure drop ranges specified in the O&M manual.
- Routine maintenance of the multiclone and wet scrubber shall be conducted in accordance with the O&M manual.

[IDAPA 58.01.01.322.01, 3/19/99]

- 3.5 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the steam production rate of the Zurn Industries hog fuel boiler. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly readings or calculations shall be implemented within 96 hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.

[IDAPA 58.01.01.322.06(c), (d), 5/1/94]

- 3.6 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the pressure drop across the Zurn Industries hog fuel boiler multi-clone and wet scrubber during operation of the hog fuel boiler.

[IDAPA 58.01.01.322.06(d), 5/1/94]

- 3.7 The permittee shall install, operate, calibrate, and maintain a device to continuously measure the scrubbing media flow rate in gallons per minute.

[Tier II/PTC No. T2-010208, 12/29/04]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee:	Bennett Lumber Products, Inc.	Facility ID No.	057-00008	Date Issued:	January 14, 2005
Location:	Princeton			Date Expires:	May 15, 2005
<i>The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.</i>					

- 3.8 The average hourly steaming rate shall be recorded at least once per day. The records shall be maintained in accordance with Permit Condition 2.11.
[IDAPA 58.01.01.322.06(c), 5/1/94]
- 3.9 The Zurn Industries hog-fuel boiler shall be fueled exclusively by wood products.
[IDAPA 58.01.01.322.01, 3/19/99]
- 3.10 At all times the permittee shall maintain in good working order and operate, as efficiently as practicable, the hog fuel boiler multi-clone and scrubber listed in this permit.
[IDAPA 58.01.01.322.01, 3/19/99]
- 3.11 The permittee shall develop and follow an O&M manual for the hog-fuel boiler's pollution control devices. The permittee shall maintain an O&M manual for the multiclone unit and an O&M manual for the wet scrubber describing the schedule and steps taken to assure the air pollution control equipment will be properly operated and maintained. The O&M manuals shall address the operation, maintenance, and repair of the multiclone unit and the wet scrubber, and shall include, at a minimum, the following:
- a general description of the control device
 - normal operating conditions, which shall include the pressure drop ranges of the multiclone and wet scrubber for the wood-waste boiler, as well as the manufacturer specifications for scrubbing media flow rate
 - normal operating procedures
 - methods of identifying and preventing malfunctions
 - appropriate corrective actions to be taken in the case of upsets and malfunctions
 - provisions for weekly inspections and routine maintenance schedules
 - relevant information about efficient concurrent operation of the multiclone unit and the wet scrubber
 - inspection frequency and evaluation criteria for the quality and flow rate for the wet scrubber scrubbing media.
 - specify the minimum scrubbing media flow rate to the wet scrubber in gallons per minute.

The O&M manuals shall be developed and submitted to DEQ within 60 days of permit issuance. The O&M manual shall be updated periodically as additional information is gained from compliance testing and day-to-day operating experience. The permittee shall submit a summary of any changes to the O&M manual within 30 days of the change.

[IDAPA 58.01.01.322.01, 3/19/99]
[Tier II/PTC No. T2-010208, 12/29/04]

Monitoring and Recordkeeping Requirements

- 3.12 The permittee shall monitor and record the pressure drop readings across the Zurn Industries hog fuel boiler multi-clone and wet scrubber once daily. In the event a pressure drop measurement device becomes inoperable, DEQ shall be notified within 24 hours and a timeline shall be established for repair or replacement of the monitoring device.

[IDAPA 58.01.01.322.06(d), 07, 5/1/94]

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Permittee: Bennett Lumber Products, Inc.
Location: Princeton

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 3.13 The permittee shall monitor and record the scrubber flow rate in gallons per minute once daily.
[Tier II/PTC No. T2-010208, 12/29/04]

- 3.14 On or before July 31, 2006 the permittee shall conduct a particulate matter performance test while combusting wood products at maximum operating capacity in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5; or a DEQ approved alternative method, as provided in Permit Condition 2.15 of this permit, while combusting hog fuel. The test shall be conducted to demonstrate compliance with the grain loading standard in Permit Condition 3.1 of this permit and with IDAPA 58.01.01.677. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The steam production rate of the boiler shall be recorded
- Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625.
- The pressure drop across the multiclone and wet scrubber shall be recorded
- The scrubbing media flow rate shall be recorded

After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in IDAPA 58.01.01.677, the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in IDAPA 58.01.01.677, the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in IDAPA 58.01.01.677, the next test shall be conducted within one year of the test date.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.09, 5/1/94]

- 3.15 The permittee shall submit compliance test reports to DEQ for the test in Permit Condition 3.14 as specified in Permit Condition 2.16.

[IDAPA 58.01.01.157.04, 4/5/00]

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Location: Princeton

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Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. DRYING KILNS

Emissions Unit Group 2 consists of six drying kilns.

Table 4.1 below describes the devices used in controlling emissions from the sources regulated in this permit.

Table 4.1 CONTROL DEVICES

Emissions Unit(s)/Process(es)	Emission Unit Identification	Emissions Control Device
Drying kiln Nos. 1, 2, 3, 4, 5, and 6	P15, P16, P17, P18, P19, P20	None

Table 4.2 contains a summary of requirements that apply generally to the facility. Specific permit requirements are listed below.

Table 4.2 REQUIREMENTS SUMMARY

Permit Conditions	Source ID	Parameter	Permit Limit/Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
4.1	P17, P20	PM	process weight	IDAPA 58.01.01.701	4.7
4.2	P15, P16, P18, P19	PM	process weight	IDAPA 58.01.01.702	
4.3	P15, P16, P17, P18, P19, P20	PM ₁₀ and VOC	ton-per-year limits	Tier II/PTC No. 057-00008, issued December 29, 2004	4.7
4.5	P15, P16, P17, P18, P19, P20	Lumber throughput	97.2 MMbf per any consecutive 12-month period	Tier II OP 057-00008, issued December 29, 2004	4.7

Emissions Limits

- 4.1. A person shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 4.2. A person shall not discharge into the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

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Permittee: Bennett Lumber Products, Inc.
Location: Princeton

Facility ID No.
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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

- 4.3 Emissions of PM₁₀ and VOC shall not exceed the corresponding limits listed in Table 4.1.

Table 4.1 DRYING KILN EMISSIONS LIMITATIONS

Emission Limits ^a – Annual ^b (T/yr)		
Source Description	Annual PM ₁₀ ^c Emissions (T/yr)	Annual VOC Emissions (T/yr)
Drying kilns	9.2	72.9

^a As determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensables.

[Tier II/PTC No. T2-010208, 12/29/04]

Operating Requirements

- 4.4 Lumber throughput of the drying kilns shall not exceed 97.2 MMbf per any consecutive 12-month period.

[Tier II/PTC No. T2-010208, 12/29/04]

Monitoring Requirements

- 4.5 The permittee shall maintain records of the monthly throughput of lumber and the monthly hours of operation of the lumber dry kilns. The monthly throughput values shall be summed for each consecutive 12-month period to demonstrate compliance with Permit Condition 4.5.

[IDAPA 58.01.01.322.06, 5/1/94]

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Location: Princeton**Facility ID No.**
057-00008**Date Issued:** January 14, 2005
Date Expires: May 15, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***5. WOODWORKING EQUIPMENT**

The woodworking equipment is controlled by several cyclones and a baghouse.

Table 5.1 below describes the devices used in controlling emissions from the sources regulated in this permit section.

Table 5.1 Control Devices

Emission Point Identification	Emissions Control Device
P7	Sawdust cyclone
P11	Shavings cyclone
P12	Shavings cyclone
P13	Shavings cyclone
P14	Shavings cyclone
P21	Sawdust cyclone
P24	Baghouse

Table 5.2 contains a summary of requirements that apply generally to the cyclones and baghouse. Specific permit requirements are listed below.

Table 5.2 Requirements Summary

Permit Conditions	Source ID	Parameter	Permit Limit/Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
5.1	P7, P11, P12, P13, P14, P21, P24	PM ₁₀	pound-per-hour and tons per year limits	Tier II/PTC No. 057-00008, issued December 29, 2004	None
5.2	P21, P24	PM	process weight	IDAPA 58.01.01.701	None
	P7, P11, P12, P13, P14,			IDAPA 58.01.01.702	

Emissions Limits

5.1 Emissions of PM₁₀ shall not exceed the corresponding limits listed in Table 5.3 below.

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Location: Princeton**Facility ID No.**
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Date Expires: May 15, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***Table 5.3 EMISSION SOURCE LIMITS**

Emission Limits ^a - Hourly (lb/hr), and Annual ^b (T/yr)		
Exhaust Points	Hourly PM ₁₀ ^c Emissions (lb/hr)	Annual PM ₁₀ ^c Emissions (T/yr)
Sawdust cyclone: P7	0.79	1.51
Shavings cyclone: P11	0.15	0.04
Shavings cyclone: P12	1.14	1.96
Shavings cyclone: P13	1.16	2.00
Shavings cyclone: P14	1.16	2.00
Sawdust cyclone: P21	1.16	2.00

^a As determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensables.

[Tier II/PTC No. T2-010208, 12/29/04]

- 5.2 A person shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 5.3 A person shall not discharge into the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

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- b If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

Operating Requirements

- 5.4 The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the cyclones and baghouse listed in this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

- 5.5 The permittee shall develop and maintain a cyclones and baghouse O&M manual. The manual shall be submitted to DEQ within 60 days of permit issuance. The O&M manual shall be updated periodically as additional information is gained. The permittee shall submit a summary of any changes to the O&M manual within 30 days of the change. The cyclones and baghouse O&M manual shall include, at a minimum, a general description of the equipment, startup, shutdown, and maintenance procedures, upset conditions guidelines, and corrective action procedures.

[IDAPA 58.01.01.322.01, 3/19/99]

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Location: Princeton**Facility ID No.**
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Date Expires: May 15, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***6. INSIGNIFICANT ACTIVITIES**

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b)(i) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1 - INSIGNIFICANT ACTIVITIES

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
ST1	Truck bark bin	30
ST2	Truck sawdust bin	30
ST3	Truck chip bin	30
ST4	Boiler fuel storage	30
ST5	Auxiliary fuel bin	30
ST6	Shavings truck bin	30
ST7	Log yard waste 1	30
ST8	Rock storage	30
ST9	Log yard waste 2	30
ST10	Ash storage	30
TR1	Hog in feed conveyor	30
TR2	Bark conveyor system	30
TR3	Hog out feed conveyor	30
TR4	Bark screen oversize	30
TR5	Deck trash conveyor	30
TR6	Truck bark bin conveyor	30
TR7	Boiler bark conveyor	30
TR8	Sawdust conveyor - vibrator	30
TR9	Chip oversize conveyor	30
TR10	Main fuel conveyor	30
TR11	Auxiliary fuel bin conveyor	30
TR12	Flyash transport	30
P1	Sawmill	30
P2	Small log debarker	30

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(1) Citation
P3	Large log debarker	30
P4	Bark hog	30
P5	Bark screen	30
P8	Chip screen	30
P9	Planing mill - new	30
P10	Planing mill - old	30
S1	20,000-gallon diesel fuel tank	(30)
S2	20,000-gallon diesel fuel tank	(30)
S3	20,000-gallon gasoline tank	(30)
S4	2,500-gallon diesel fuel tank	(30)
S5	1,000-gallon stove oil tank	(30)
S6	30-gallon parts washer	(2)
S7	30-gallon parts washer	(2)
S8	30-gallon parts washer	(2)
S9	2,000-gallon aviation gas storage	(30)
S10	1,000-gallon used oil tank	(30)
ST8	2,000 cubic yd. Rock storage	(30)
	John Deere, PowerTech model number 6081AF001 emergency generator for fire pump, diesel-fuel fired, rated at 250 horsepower	(30)

- 6.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in facility-wide permit conditions of this permit.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a; 40 CFR 70.6(a)(6)(I)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b; 40 CFR 70.6(a)(6)(II)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c; IDAPA 58.01.01.386; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(III)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d; 40 CFR 70.6(a)(6)(III)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e; 40 CFR 70.6(a)(6)(IV)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122 and 322.15.f; 40 CFR 70.6(a)(6)(v)]
8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.128; 40 CFR 70.6(a)(6)(v)]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200 through 223; IDAPA 58.01.01.322.15.i; IDAPA 58.01.01.380 through 386; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 USC Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Clean Air Act Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381 through 385; IDAPA 58.01.01.209.05; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "State-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "State-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- 14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee:	Bennett Lumber Products, Inc.	Facility ID No.	Date Issued:	January 14, 2005
Location:	Princeton	057-00008	Date Expires:	May 15, 2005
<i>The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.</i>				

- 14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- 14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.10.a.ii; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.399.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o; 40 CFR 70.6(a)(3)(III)(A); 40 CFR 70.5(d)]

Renewal

- 18.1 The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03; 40 CFR 70.5(a)(1)(III)]

- 18.2 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p; 40 CFR 70.7(b)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.	Facility ID No. 057-00008	Date Issued: January 14, 2005
Location: Princeton		Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- 19.1 Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- 19.1.1 DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- 19.2 The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- 19.3 Nothing in this permit shall alter or affect the following:
- 19.3.1 Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- 19.3.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 19.3.3 The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- 19.3.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.
- [Idaho Code §39-108 and 112; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.m;
IDAPA 58.01.01.325; IDAPA 58.01.01.381.04; IDAPA 58.01.01.382.04; IDAPA 58.01.01.383.05;
IDAPA 58.01.01.384.03; IDAPA 58.01.01.385.03; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20.1 For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- 20.2 For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- 20.3 For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- 20.4 For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.9
& 10; 40 CFR 70.6(c)(3) and (4)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.
Location: Princeton

Facility ID No.
057-00008

Date Issued: January 14, 2005
Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- 21.1 The permittee's reporting period for annual compliance certifications for all emissions units shall be from January 1 to December 31 each year. The compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA within 30 days of the end of the specified reporting period;
- 21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- 21.3.4 Such other facts as DEQ may require to determine the compliance status of the source.
- 21.4 All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11; 40 CFR 70.6(c)(5)(III) as amended,
62 Fed. Reg. 54900, 54946 (10/22/1997); 40 CFR 70.6(c)(5)(IV)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-020203

Permittee: Bennett Lumber Products, Inc.	Facility ID No. 057-00008	Date Issued: January 14, 2005
Location: Princeton		Date Expires: May 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31 each year. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q and 322.08.c; 40 CFR 70.6(a)(3)(III)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.135; 40 CFR 70.6(a)(3)(III)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01; 40 CFR 70.6(g)]